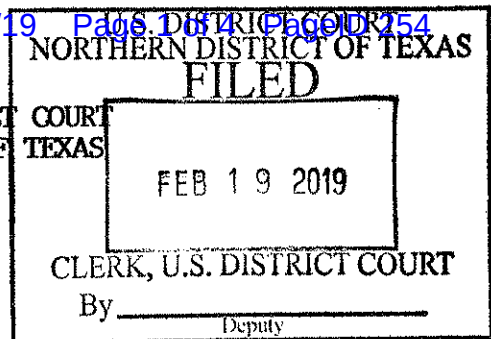


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



Lisa Biron,
Plaintiff

v.

Civil Action No. 4:15-CV-205-0

Jody Upton, Warden, FMC-
Carswell, et al,
Defendants

**Motion to Strike Defendants' Motion to Dismiss or to
Expunge and Exclude All References to Confidential State of
New Hampshire Juvenile Dispositional Proceeding, and for Order of
Protection to Prevent Further Disclosure**

On February 5, 2019, the Defendants, via AUSA Brian W. Stoltz, filed a motion to dismiss. Throughout the Motion, Defendants reveal and disclose private and protected information from a State of New Hampshire Juvenile Dispositional Hearing, In re R.B., no. 656-2012-JV-326. Papers filed in in this confidential proceeding were likewise disclosed by AUSA Angie Henson in a habeas proceeding in this Court (no. 4:14-CV-823). To compound these illegal disclosures, this Court referenced language from the confidential, sealed pleading in its original order dismissing this case.

It is unclear how the Defendants and their attorneys gained access to these documents, but it is believed that the single pleading in their possession, which is now broadcast to the public, was mailed to the FCI Danbury in October 2013.

Ms. Biron has repeatedly attempted to explain that this pleading and the information contained therein is private, protected information, which

the Defendants have wrongfully obtained, and which, therefore, has no legal force or relevance to this law suit. Ms. Biron submitted, with her Amended Complaint, proof from the State of New Hampshire that a "no-contact" order has never been issued by any New Hampshire court at any time.

Wherefore, the Defendants' repeated and unlawful disclosure of any matters or pleadings from this juvenile case (which did not terminate Ms. Biron's parental rights as Attorney Stoltz continually persists) is irrelevant and a violation of state and federal privacy laws and an invasion of R.B.'s privacy.

While Ms. Biron and R.B. contemplate their civil remedies against the parties responsible for these unlawful disclosures, she seeks a protective order from this Court to prevent further violations. She also seeks to strike the Defendants' Motion to Dismiss or, in the alternative to expunge all references to the juvenile case or the habeas cases that reference the juvenile case. She also requests this Court seal the portions of the habeas case (4:14-CV-823) wherein documents or information found only in the juvenile case is disclosed.

In addition, Ms. Biron seeks an extension of time to file her opposition to the Motion to Dismiss until 21 days after this Court's ruling on this motion.

Respectfully submitted

2/14/2019
Date

Lisa Biron
Lisa Biron
FCI Waseca
P.O. Box 1731
Waseca, MN 56093

Verification

I, Lisa Biron, hereby swear, under penalty of perjury, that the matters and facts alleged in the foregoing Motion are true and correct.

2/14/2019
Date

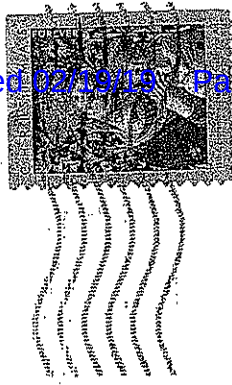
Lisa Biron
Lisa Biron

Certification of Service

I certify that a copy of the within Motion was mailed to Brian Stoltz postage on this date.

2/14/2019
Date

Lisa Biron
Lisa Biron



NORTHERN DISTRICT COURT
FORT WORTH DIVISION
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Federal Correctional Institution
P.O. Box 1731
Waseca, MN 56093-0741

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Us District Court
Clerk of Court
501 W 10TH ST
Room 310
FORT Worth, TX 76102
United States

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